

From: [Jacobson, Linda](#)
To: [McCarter, Jennifer](#)
Cc: [Bailey, Treasure](#); [Kilty, Quinn V](#); [Bloomberg, Jon H](#); [Figur, Charles \(he/him\)](#)
Subject: RE: follow up to discussion this morning of paragraphs 81 and 95 (c) of the draft Consent Agreement for Comanche Station
Date: Thursday, May 5, 2022 2:16:00 PM

Thank you, Jennifer, for providing this information to us. Treasure and I are reviewing it and may want to schedule a short call with you in the future to discuss this further. My understanding had been that wells which may be sampled would still have dedicated pumps installed; and, only those wells used for just water levels would not. Let us finish our review, then we can discuss further.

I appreciate your efforts in pulling all of this information together for us.

Linda

From: McCarter, Jennifer <jennifer.mccarter@xcelenergy.com>
Sent: Tuesday, May 3, 2022 4:58 PM
To: Jacobson, Linda <Jacobson.Linda@epa.gov>
Cc: Bailey, Treasure <Bailey.Treasure@epa.gov>; Kilty, Quinn V <quinn.v.kilty@xcelenergy.com>; Bloomberg, Jon H <Jon.H.Bloomberg@xcelenergy.com>; Figur, Charles (he/him) <Figur.Charles@epa.gov>
Subject: RE: follow up to discussion this morning of paragraphs 81 and 95 (c) of the draft Consent Agreement for Comanche Station

Hi Linda, as discussed yesterday, this email provides our proposal for wells that would not require dedicated pumps. My understanding from the call is that the wells would not be specifically listed in the final order. Rather, this list represents the wells that are measured for water levels only and in some cases would be sampled 'if sufficient water is present'. The Groundwater Monitoring System Certification was updated (Rev. 2) in June 2021 with the wells that were installed in August and December 2020. The plan will be updated again (Groundwater Monitoring System (GSA) Plan) pursuant to the final order, and subject to EPA's approval we propose to add the new wells drilled in November 2021, and define those wells that would not require dedicated pumps.

The list of wells is W-2, W-2B, W-8A, W-8B, W-10A, W-10B, W-13, MW-1, MW-2, MW-4, as further described below. Attached for reference are the wells figure, well construction logs, Table 3 well construction details, and Table 4 2020-2021 water levels.

Bottom Ash Pond

W-2 drilled in 1997 and was dry; screened 7-17' bgs in colluvium

- Low but measurable water levels in early and late 2020; dry in 2021
- currently included in the certified network, as 'measure water levels and sample if sufficient water present'
- with the installation of W-2A and W-2C in weathered shale, we had anticipated dropping W-2 (colluvial) from the system in the next update

W-2B - screened 53'-73' in consolidated shale; water level 52.26' bgs; background sampled 2020, but removed from network in 2021

W-8A and W-8B – drilled August 2020

- W-8A – screened 15'-30' bgs in alluvium and weathered shale; dry since drilled; included in certified network as 'measure water levels and sample if sufficient water present', but unlikely to produce water
- W-8B – screened in consolidated shale; measurable water, but 'functionally dry'; not included certified network

W-10A and W-10B – drilled December 2020, included in 2021 certified network, but water levels only for potentiometric surface definition; no sampling proposed

- W-10A is screened 7'- 17' bgs in colluvium is dry
- W-10B is screened 20' – 30' bgs in weathered shale and has water

W13 – drilled December 2020; screened in weathered shale; dry since drilled; in area of known bedrock high and similar to W-8A which has been dry

Landfill

- MW-1, MW-2 and MW-4 original colluvial wells have always been dry (since installation in 1987), and are retained in the network only to check for presence of water

Jennifer McCarter, R.E.M.

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I am working remotely. Please contact me through email or cell (720) 810-1220

From: Jacobson, Linda <Jacobson.Linda@epa.gov>

Sent: Monday, May 2, 2022 11:26 AM

To: McCarter, Jennifer <jennifer.mccarter@xcelenergy.com>; Bloomberg, Jon H <Jon.H.Bloomberg@xcelenergy.com>; Bailey, Treasure <Bailey.Treasure@epa.gov>; Figur, Charles (he/him) <Figur.Charles@epa.gov>

Subject: follow up to discussion this morning of paragraphs 81 and 95 (c) of the draft Consent Agreement for Comanche Station

EXTERNAL - STOP & THINK before opening links and attachments.

Jennifer and Jon,

Thank you again for your time this morning. We had discussed two matters: the approval/disapproval of consultants and laboratories as outlined in paragraph 81 and the installation

of dedicated pumps in wells used in the detection and assessment monitoring network as described in paragraph 95 (c). A copy of the referenced Consent Agreement is attached.

As we discussed, we appreciate your sharing your list of proposed consultants and labs with us, a copy of which is attached to this email. EPA does not intend to disapprove any of the consultants or labs listed on your submission. We do note that we have had concerns with the accuracy and completeness of some of your past determinations and documents posted to either the publicly accessible website or submitted to Region 8. We wished to emphasize that the intent of the approval language is to help ensure that your company hires qualified professionals who produce work products at the level that we need. Due to past concerns and although we will not be issuing a disapproval at this time, we will be initially scrutinizing future required submittals closely.

On the second point, we understand that Jon will be crafting language clarifying that dedicated pumps will not be installed in wells monitored only for water levels. Jennifer will be submitting a list of those wells for which dedicated pumps will not be installed as well as additional details on those wells. She will also clarify what is meant by “typically” or “usually” dry.

Thank you, again.

Linda Jacobson
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